

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CEMENT MASONS LOCAL 527, et al.,)	
)	
Plaintiffs,)	
)	Case No. 4:14-CV-01030 JAR
v.)	
)	
STIKA CONCRETE CONTRACTING CO., INC.,)	
)	
Defendant.)	

**MOTION FOR A CREDITOR'S BILL IN EQUITY
AND TO PIERCE THE CORPORATE VEIL**

Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and pursuant to the established procedures of the State of Missouri relating to proceedings in aid of execution, plaintiffs move the Court for equitable relief in the form of a creditor's bill to allow the plaintiffs to proceed to satisfy the judgments entered in this case against Stika Concrete Contracting Co., Inc. which are not subject to execution by normal means available at law.

Plaintiffs seek an Order from this Court allowing them to satisfy their judgment against the above defendant by proceeding against Stika Concrete and General Contracting, the alter ego of this defendant.

Plaintiffs have no adequate legal remedy. Further grounds supporting the use of a creditor's bill and piercing the corporate veil are set forth in the accompanying memorandum of law.

Respectfully submitted,

HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
Phone: (314) 727-1015
Fax: (314) 727-6804

/s/ Greg A. Campbell
GREG A. CAMPBELL, #2774

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2015, the foregoing was filed electronically with the Clerk of the Court and served via U.S. Mail to the following:

Mary Skaggs
Stika Concrete Contracting
10703 Tesshire Drive
St. Louis, MO 63123

/s/ Greg A. Campbell